

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 1:24-10034-ADB
	)	
v.	)	Violation:
	)	
ZHENDI WANG,	)	<u>Count One:</u> Operation of Unlicensed Money
	)	Transmitting Business
	)	(18 U.S.C. § 1960(a))
Defendant.	)	
	)	<u>Forfeiture Allegation:</u>
	)	(18 U.S.C. § 982(a)(1))
	)	

SUPERSEDING INFORMATION

COUNT ONE

Operation of Unlicensed Money Transmitting Business  
(18 U.S.C. § 1960(a))

The United States Attorney alleges:

From in or about July 2019, through in or about August 2023, in the District of Massachusetts, in the Central District of California, in the District of New Jersey, and elsewhere, the defendant,

ZHENDI WANG,

did knowingly conduct, control, manage, supervise, direct, and own all and part of an unlicensed money transmitting business, as that term is defined in Title 18, United States Code, Section 1960(b)(1), in that the business affected interstate and foreign commerce, in any manner and degree; and was operated without an appropriate money transmitting license in a State where such operation is punishable as a misdemeanor or a felony under State law, and/or failed to comply with the money transmitting business registration requirements under Title 31, United States Code, Section 5330, and regulations prescribed therein.

All in violation of Title 18, United States Code, Section 1960(a).

FORFEITURE ALLEGATION  
(18 U.S.C. § 982(a)(1))

The United States Attorney further alleges:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1956, set forth in Count One, the defendant,

ZHENDI WANG,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property.

The property to be forfeited includes, but is not limited to, the following:

- a. \$116,004.15 in funds, seized on or about July 29, 2023 from East West Bank Checking Account No. \*2192, held in the name of ZHIPENG ZHAO;
- b. \$99,201.07 in funds, seized on or about July 29, 2023 from Bank of America Checking Account No. \*1356, held in the name of WENWEN ZHAO;
- c. \$183,869.09 in funds, seized on or about July 29, 2023 from East West Bank Checking Account No. \*2068, held in the name of ZHENDI WANG;
- d. \$5,007.88 in funds, seized on or about July 29, 2023 from East West Bank Savings Account No. \*8226, held in the name of ZHENDI WANG; and,
- e. \$636,438.00 in funds, seized on or about July 29, 2023 from Cetera Investment Services Account No. \*2444, held in the name of ZHENDI WANG;
- f. A dollar amount to be determined and to be entered in the form of a forfeiture money judgment;

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;


- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

JOSHUA S. LEVY  
Acting United States Attorney

By:

 Digitally signed by EVAN  
PANICH  
Date: 2024.11.13  
13:00:14 -05'00'

---

LINDSEY E. WEINSTEIN  
EVAN D. PANICH  
Assistant United States Attorneys  
District of Massachusetts

DATE: November 13, 2024